

IN THE DISTRICT COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. CROIX

NICOLE WOOTEN,

Plaintiff,

v.

LIMETREE BAY TERMINALS d/b/a  
OCEAN POINT TERMINALS, PORT  
HAMILTON REFINING AND  
TRANSPORTATION, and WEST  
INDIES PETROLEUM, LTD.,

Defendants.

Case No. 1:23-CV-00012

**ACTION FOR DAMAGES**

**JURY TRIAL DEMANDED**

**NOTICE OF SERVICE OF PLAINTIFF NICOLE WOOTEN'S SECOND  
DEMAND FOR PRODUCTION OF DOCUMENTS TO DEFENDANT  
PORT HAMILTON REFINING AND TRANSPORTATION**

**PLEASE TAKE NOTICE** that Plaintiff, **NICOLE WOOTEN** has propounded her Second Demand for Production of Documents to Defendant **PORT HAMILTON REFINING AND TRANSPORTATION** through her respective counsel of record, and that said Documents were served upon the Defendant in the original.

RESPECTFULLY SUBMITTED  
LEE J. ROHN AND ASSOCIATES, LLC  
Attorneys for Plaintiff

DATED: February 5, 2025

BY: /s/ Lee J. Rohn

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Wooten, Nicole v. Limetree Bay Terminals, et. al., Case No. 1:23-CV-00012

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DEFENDANT PORT HAMILTON REFINING AND TRANSPORTATION

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### **CERTIFICATE OF SERVICE**

**THIS IS TO CERTIFY** that on February 5, 2025, I electronically filed the foregoing with the Clerk of Court using the electronic filing system, which will send a notification of such filing to the following:

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201 East Las Olas Boulevard, Suite 1800  
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Attorney for **Limetree Bay Terminals, LLC d/b/a Ocean Point  
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Attorney for **West Indies Petroleum, Ltd.**

BY: /s/ Lee J. Rohin (slc)